

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

BRAD WINCHELL, <i>et al.</i>)	
)	
Plaintiffs,)	
)	
v.)	
)	Civil Case No. 3:18-cv-0047-HEH
)	
LEXISNEXIS RISK SOLUTIONS FL, INC.,)	
)	
Defendant.)	
)	

JOINT MOTION TO ENTER STIPULATED PROTECTIVE ORDER

Plaintiffs and Defendant, through their respective attorneys of record, respectfully request that the Court enter the accompanying Stipulated Protective Order (attached as Exhibit 1) to facilitate disclosure and production in this matter and to protect the parties' confidential, proprietary, and/or business information.

Dated: May 9, 2018

Respectfully submitted,

/s/ Julie D. Hoffmeister

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CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of May, 2018, I electronically filed the foregoing with the Clerk of Court using the CM/ECF System, which will then send a notification of such filing (NEF) to the following:

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